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October 19, 2001

By Messenger

Mary Cottrell, Secretary
Department of Telecommunications and Energy
Commonwealth of Massachusetts
One South Station
Boston, MA 02110

Re: D.T.E. 01-20 – UNE Rates

Dear Secretary Cottrell:

In its October 18, 2001, Interlocutory Order regarding several motions by AT&T, the Department directed AT&T at page 4 “to produce any remaining [discovery] responses within ten days of issuance of this Order.” I write to confirm that AT&T has already provided all discovery responses, so that none remain to be produced.

Between the Hearing Officer’s August 8 ruling on Verizon’s Motion to Compel and the Department’s August 31 Interlocutory Order on Verizon’s appeal regarding a portion of that motion to compel, AT&T was ordered to file supplemental responses to 59 Verizon discovery requests.

AT&T dedicated substantial resources to this task and provided 9 supplemental responses on August 23 and an additional 37 supplemental responses on September 7, 2001. The atrocities in New York and elsewhere on September 11 temporarily delayed the ability of AT&T staff, displaced from their offices several blocks from the World Trade Center, to provide any additional responses. Nonetheless, on September 21 AT&T provided an additional 9 supplemental responses, on September 26 it provided an additional 2 supplemental responses, and on October 16 it provided its final supplemental response. Therefore, as of October 16, AT&T had provided supplemental responses to 58 of the 59 discovery requests that were the subject of the August 8 and August 31 rulings. The Department’s October 18 order granted the relief AT&T had sought with respect to the one remaining discovery response.

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Therefore, AT&T has now provided a supplemental response to all of the discovery requests that were the subject of the Department's orders. In so doing, AT&T has produced many thousands of pages of documentation and provided substantial additional information.

Very truly yours,

Kenneth W. Salinger

enclosure

pc: Service List